

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

Criminal No: 3:22-344

v.

KELSEY ANTONIO MCCALLUM

EXPERT WITNESS NOTICE

The Government, pursuant to Rule 16, Fed. R. Crim. P., hereby gives notice of its intent to call Adam Cameron, Senior Special Agent, Bureau of Alcohol, Tobacco, Firearms, and Explosives, as an expert in firearm trafficking investigations. His expertise is based upon his training, expertise, and investigations involving firearms. Senior Special Agent Cameron has been employed as an ATF Special Agent for over twenty-five years and has worked in the Camden, New Jersey, Philadelphia, Pennsylvania and Fayetteville, North Carolina Field Offices. Senior Special Agent Cameron has been qualified as an expert in interstate nexus in the Eastern District of Pennsylvania and the Eastern District of North Carolina. His prior federal expert qualifications over the last four years are as follows:

- A) May 29, 2019- before the Honorable United States District Court Judge Boyle, Eastern District of North Carolina- Raleigh. US v. Daquan Madrid Pridgen (7:18-CR-00032-BO-2).
- B) February 25, 2020- before the Honorable United States District Court Judge Britt, Eastern District of North Carolina- Raleigh. US v. James Calvin Breeden (7:19-CR-00117-BO-1).
- C) February 25, 2021- before the Honorable United States District Court Judge Devers, Eastern District of North Carolina- Raleigh. US v. Jonathan Lynn Jenkins (5:18-CR-00451-D-1).

D) D). September 2, 2022- before the Honorable United States District Court Judge Myers, Eastern District of North Carolina- Wilmington. US v. Yomere Juan Busbee (5:20-CR-00393-M-1).

E) August 1, 2023- before the Honorable United States District Court Judge Flannigan, Eastern District of North Carolina- New Bern. United States v. Charles McRae (18:CR-00334-FL).

Senior Special Agent Cameron has conducted firearm trafficking investigations in the following jurisdictions indicating the path of the trafficked firearms:

A) The Eastern District of Pennsylvania. USA v. LASHLEY (2:09cr307)- South Carolina to Pennsylvania.

B) The Middle District of North Carolina. USA v. MARSHALL (1:23cr344)- North Carolina to North Carolina and New Jersey.

C) The Eastern District of North Carolina. USA v. HIGHSMITH et al (5:23cr241)- North Carolina to the Texas border.

D) The Judicial District of New Jersey. 2002- USA v. THOMAS (1:02m1110)- Texas to New Jersey.

Senior Special Agent Cameron will testify concerning the definition of source state, market state, the “iron pipeline”, characteristics involved in investigating and determining firearms trafficking, including the “time to crime”, number of firearms purchased, types of firearms purchased, repetitive buying of same or similar types of firearms, place of purchase of firearms, place where firearms are found, including tracing of firearms, number of locations where firearms are purchased, traces of firearms, what is a straw purchase, why person(s) straw purchase firearms, etc.

Senior Special Agent Cameron will testify in these areas based upon his experience, training, and education experiences.

Adam Cameron
ATF, Senior Special Agent

Respectfully submitted,

ADAIR F. BOROUGHS
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